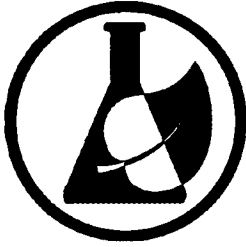


US EPA ARCHIVE DOCUMENT



Laboratory Consortium for Environmental Excellence (LCEE)
c/o ML Strategies, Inc.
One Financial Center
Boston, MA 02111
617-348-1838
617-542-2241 (fax)

September 25, 1998

Mr. Paul Burns
Massachusetts Public Interest Research Group
29 Temple Place
Boston, MA 02111

Dear Paul,

Enclosed please find a copy of the draft "Direct Final Rule" for what EPA refers to as the New England Laboratory Project. Because the enclosed draft Final Rule is more current than our proposed "Final Project Agreement" (FPA), I have not included the FPA in this package, except to include Tables 3 and 4 which highlight annual reporting responsibilities and environmental performance goals and measures. I have also included in this package, a copy of the brochure for the Laboratory Consortium for Environmental Excellence (LCEE), the umbrella group which has spearheaded this effort. For more information on the LCEE and the XL Project, I would encourage you to visit our web site at <http://esf.uvm.edu/labxl>.

I look forward to discussing this project with you on Wednesday at 3:00 p.m.

Yours truly,

Thomas P. Balf

cc: Suzanne Howard, Boston College
Zehra Schneider Graham, University of Massachusetts Boston
Jim Fox, University of Massachusetts Amherst

Attachments



Laboratory Consortium for Environmental Excellence (LCEE)
c/o ML Strategies, Inc.
One Financial Center
Boston, MA 02111
617-348-1838
617-542-2241 (fax)

October 6, 1998

Mr. Paul Burns
Massachusetts Public Interest Research Group
29 Temple Place
Boston, MA 02111

Dear Paul,

Thank you for taking the time to meet with me last week to discuss the New England Laboratory XL Project. Per your suggestion, I will follow up with Merrimack College's National Microscale Center to explore opportunities to more effectively incorporate "microscale" chemistry into the laboratories of the institutions participating in our XL Project. As we discussed, Boston College, University of Massachusetts and the University of Vermont are already utilizing, to some degree, microscale chemistry. I know that these institutions support the use of microscale chemistry as an important tool in reducing potential exposures to laboratory workers and preventing pollution - two of the primary goals of this project.

I will notify you when the University of Massachusetts Boston hosts a local stakeholder meeting later this month and will include Massachusetts PIRG on the stakeholder list to receive future information concerning the status of the project and environmental performance data when it becomes available.

If you have any questions, please do not hesitate to contact me at 617-348-1838 or at tbalf@mlstrat.com.

Yours truly,

Thomas P. Balf

cc: Gina Snyder, Environmental Protection Agency
Suzanne Howard, Boston College
Zehra Schneider Graham, University of Massachusetts Boston
Jim Fox, University of Massachusetts Amherst

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701 Pennsylvania Avenue, N.W.
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October 14, 1998

Mr. David Lennett
PO Box 71
Litchfield, ME 04350



Dear David:

Thank you for your interest in the Project XL Proposal to EPA. As I described in my email, I am enclosing a complete copy of the New England Laboratory XL Proposal for your review. While I believe that our request for a conditional exemption for laboratory wastes in the laboratory remains intact, EPA continues to evaluate the exact legal mechanism and regulatory citation for granting this regulatory relief under Project XL. In other words, the request for regulatory relief described in our Final Project Agreement may soon be revised or modified based on EPA and stakeholder comments.

Please feel free to contact me at 617-348-1838 if I can be of any further assistance.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Tom Balf", is written over the typed name "Thomas P. Balf".

Thomas P. Balf

Enclosure

MLSDOCS: 1015153.1 (lr@p01!.doc)

ML Strategies, Inc.

One Financial Center
Boston, Massachusetts 02111
617 348 4400
617 542 2241 fax

701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
202 296 3622
202 434 7400 fax

January 27, 1999

Mr. Paul Burns
Massachusetts PIRG
29 Temple Place
Boston, MA 02111



Dear Paul,

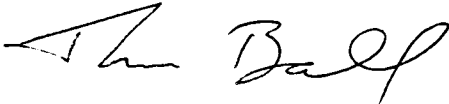
Enclosed please relevant draft documents concerning the Laboratory Project XL. As we discussed a few months ago, this XL Project would test an alternative system for managing hazardous wastes in laboratories at the University of Vermont, University of Massachusetts-Boston and Boston College. It is our contention that such a system will promote pollution prevention and the reuse of hazardous chemicals that might otherwise be discarded as hazardous waste and increase environmental awareness among laboratory workers. The Universities commit to track environmental performance using certain environmental performance indicators and report annually on their implementation progress and environmental performance. All this is described more fully in the enclosed documents.

At our last discussion, you expressed concerns regarding treatment of hazardous wastes in laboratories. A number of other environmental community members have expressed similar concerns. As a result, none of the schools in this Project will be seeking relief from federal or state treatment regulations. You also expressed interest in tracking the environmental performance of the institutions over the course of this four year pilot. Those conditions have not changed nor our commitment to "transparency." Each institution will post on its web site, and make available to interested parties, a copy of its Environmental Management Plan -- the policies and procedures governing the management of laboratory waste and the implementation of reduction and reuse programs. Additionally, as mentioned above, annual reports concerning environmental performance will be publicly available and shared with interested parties. In this manner, the bottom line - superior environmental performance - can be effectively used to evaluate the merits of this regulatory approach for laboratories, compared to the traditional command and control RCRA approach.

If you have any comments, please forward them to me no later than February 5. The institutions and the EPA have worked diligently over the last six months addressing various concerns expressed by agency personnel and environmental community stakeholders. This last draft review is designed to serve as a final "check" before the proposed rule is published in the Federal Register. The proposed rule should be published in the Federal Register by mid to late February and will include a 30 day comment period.

If you have any questions, please do not hesitate to contact me at 617-348-1838.

Yours truly,

A handwritten signature in black ink, appearing to read "Tom Balf". The signature is fluid and cursive, with the first name "Tom" and last name "Balf" clearly distinguishable.

Thomas P. Balf

cc: Anne Kelly, EPA Region I

MLSDOCS: 1017463.1 (lt2v01!.doc)